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February 9, 2021

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Holden, et al. v. The Port Authority of New York and New Jersey, et al.*, 1:17-cv-02192-JGK

Dear Judge Koeltl:

Pursuant to the Court's instruction during the February 5, 2021 hearing before Your Honor, the Parties in the above-captioned action have met and conferred in an effort to mutually agree upon a procedure for the revision of the expert reports of Mr. Michael Coan for Defendants and Dr. Jason Pierceson for Plaintiffs, to make consistent with Your Honor's ruling on the Parties' motions *in limine*.

The parties are in agreement that each will serve revised expert reports on February 26, 2021. After this exchange of revised expert reports, in an effort to avoid burdening the Court with additional motion practice the Parties will meet and confer to discuss any remaining concerns. If the Parties are unable to resolve these concerns, the Parties agree that they will file motions with respect to the content of the revised expert reports in accordance with the agreed upon briefing schedule described below:

Proposed Motions <i>in Limine</i> Briefing Schedule	
Opening Briefs	March 19, 2021
Opposition Briefs	April 2, 2021
Reply Briefs	April 9, 2021

The Parties respectfully request that the Court to grant this joint request. Thank you for your continued attention to this matter.

Respectfully submitted,

/s/ Seth E. Spitzer
Seth E. Spitzer

WINSTON
& STRAWN
LLP

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